

December 17, 2003

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Michael O. Leavitt, Administrator  
U.S. Environmental Protection Agency  
Ariel Rios Bldg. (1101A)  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

201-14934



**PETA**

PEOPLE FOR THE ETHICAL  
TREATMENT OF ANIMALS

HEADQUARTERS  
501 FRONT STREET  
NORFOLK, VA 23510  
TEL 757-622-PETA  
FAX 757-622-0457

Re: Comments on the HPV test plan for sodium dichloro-s-triazinetrione and sodium dichloro-s-triazinetrione dihydrate

Dear Administrator Leavitt:

The following comments are on the test plan for sodium dichloro-s-triazinetrione (CAS no. 2893-78-9) and sodium dichloro-s-triazinetrione dihydrate (CAS no. 51580-86-0), prepared by the Isocyanurate Industry *Ad Hoc* Committee. These comments are submitted on behalf of People for the Ethical Treatment of Animals, the Physicians Committee for Responsible Medicine, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These animal, health and environmental protection organizations have a combined membership of more than ten million Americans.

In the test plan, cover letter and attached summaries, the *Ad Hoc* Committee has presented a great deal of data from previous studies carried out by both itself and other organizations, and on the basis of these data it has appropriately concluded that no additional testing is necessary under the High Production Volume Chemical Challenge.

The *Ad Hoc* Committee has appropriately classified the anhydrous and hydrated forms of sodium dichloro-s-triazinetrione together, and has also used data from trichloro-s-triazinetrione, cyanuric acid and monosodium cyanurate in a supplementary and/or surrogate capacity. This approach is based on the fact that sodium dichloro-s-triazinetrione hydrolyzes to isocyanuric acid in water, and it represents an application of the following principle, which has repeatedly been stated by the EPA:

“Participants shall maximize the use of scientifically appropriate categories of related chemicals and structure activity relationships.” (Wayland, letter, Oct. 4, 1999, <http://www.epa.gov/chemrtk/ceoltr2.htm>, “Data collection and development on HPV chemicals,” Dec. 26, 2000, *Federal Register*, Vol. 65, No. 248, p. 81691).

Thank you for your attention to these comments. I can be reached at 757-622-7382, extension 1304, or via e-mail at [JessicaS@peta.org](mailto:JessicaS@peta.org).

Sincerely,

Jessica Sandler  
Federal Agency Liaison